

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Microsoft Petition for Rulemaking Seeking)	ET Docket No. 14-165
Amendment of Part 15 of the Commission's Rules)	
for Unlicensed Operations in the Television Bands,)	
Repurposed 600 MHz Guard Bands and Duplex)	
Gap, and Channel 37)	
)	

**Reply Comments of
Theatre Communications Group**

Writing in regard to concerns about Microsoft Corporation's Petition for Rulemaking.¹ The Oregon Shakespeare Festival is a world renowned non-for profit theatrical organization, located in Southern Oregon's rural Rogue Valley. We rely heavily on wireless technology for our productions, using a combination of wireless microphones, assisted listing devices, and wireless communication. Even though we are a large theatrical organization compared to other non-for profit regional theatres, we are too small to apply for a Part 74 license because we do not consistently use fifty plus wireless devices everyday.² This year, due to T-Mobile's new technology, we have seen and have been effected by the use of the new White Space limited availability. We spent significant money to comply with the new regulations at a time when our organization has been hit by financial loss from the implications of summer wild fires.

I agree with the sentiments from Shure³, that Microsoft is being too hasty and there is not significant data on how this technology will effect White Spaces. There needs to be further investigation. The current White Space ruling took years to come to fruition. Any significant rule changes need to be analyzed by those organizations who were part of the current legislation.

¹ Petition for Rulemaking of Microsoft Corporation, filed in ET Docket No. 14-165 on May 3, 2019.

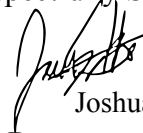
² See Order on Reconsideration and Further Notice of Proposed Rulemaking in ET Docket No. 14-165, July 14 2017.

³ See Comments of Shure Incorporated in ET Docket No. 14-165 dated June 10, 2019.

More reliable data needs to be gathered on how the power boost of antennas will impede the proper functionality of wireless devices.

If Microsoft's idea do come to pass, the wireless microphone community need the Part 74 license to be expanded to organizations who use far less than fifty wireless devices, and the White Space geolocation database needs to be operational.

Respectfully Submitted

A handwritten signature in black ink, appearing to read 'Joshua Horvath', written over a horizontal line.

Joshua Horvath
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Dated: June 21, 2019